

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:14-CR-00175 AGF (DDN)
)	
MARK PALMER <i>et. al</i> ,)	
)	
Defendant.)	

**DEFENDANTS' JOINT CONSENTED MOTION FOR EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS**

COME NOW Defendants, by and through their respective undersigned counsel, and hereby move this Court to enter its Order extending to February 16, 2016 the deadline to file motions to suppress tangible evidence, statements or evidence obtained through electronic surveillance. In support of their motion, to which the Government has no objection, Defendants state as follows:

1. On October 7, 2015 the Court entered an Order requiring Defendants to file pretrial motions to suppress tangible evidence, motions to suppress statements and motions to suppress evidence obtained through electronic surveillance ("Pretrial Motions") no later than December 15, 2015. *See* Doc. 180.

2. On October 31, 2015 Defendants filed a Motion that included, among other relief, an extension of the deadline to file Pretrial Motions to January 15, 2016. *See* Doc. 190.

3. Defendants now move this Honorable Court for additional time to file Pretrial Motions, specifically up to and including February 16, 2016.

4. The Government's eighth and presumably last batch of voluminous discovery, Batch 8, was individually distributed to Defendants throughout the fall of 2015, and Defendants require additional time to review the 412 gigabytes of information included within Batch 8 to determine whether any Pretrial Motions may be filed relative to it. Batch 8 was not able to be loaded to the Relativity review platform, requires more time to review.

5. Counsel for the undersigned Defendants have met and will continue to meet to draft any potential motions to suppress that may lie in this case. The efforts of counsel, however, were recently hindered due to the holiday season and other professional obligations immediately thereafter. Additional time is necessary for Counsel to confer and determine whether filing Pretrial Motions are appropriate for their respective clients.

6. The additional time Defendants are requesting through this motion is necessary to afford counsel the reasonable time necessary to effectively complete their respective investigation and to prepare any necessary motions to suppress.

7. Counsel for Defendant Robert Wolfe in Case number 4:14-CR-00175-AGF(DDN) communicated with Assistant U.S. Attorney James Delworth on behalf of all defendants regarding the extension of time sought by this Motion, and the Government does not object to the relief requested by Defendants being granted by the Court.

WHEREFORE, for the foregoing reasons, Defendants jointly request that the Court grant their motion for an extension of time to file motions to suppress and enter its Order extending the deadline for the filing of such suppression motions or waivers of the same to and including February 16, 2016.

Dated: January 13, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 13th day of January, 2016, a true and correct copy of the foregoing was filed with the Court using the CM/ECF system, and service upon all participants in the case who are CM/ECF users will be accomplished by operation of that system.

/s/Zachary J. Borowiak